LAW OFFICES OF

JEFFREY LICHTMAN

11 EAST 44TH STREET
SUITE 501
NEW YORK, NEW YORK 10017
www.jeffreylichtman.com

JEFFREY LICHTMAN
JEFFREY EINHORN
DAVID GELFAND

PH: (212) 581-1001 FX: (212) 581-4999

September 11, 2023

VIA ECF

Hon. John P. Cronan United States District Judge Southern District of New York 500 Pearl Street New York, New York 10007

Re: United States v. Thapa, 22 CR 654 (SDNY)

Dear Judge Cronan:

I am writing on behalf of defendant Rikesh Thapa to respectfully request a modification of the defendant's conditions of release which would permit him to travel to Illinois to attend the wedding of close friends. Pretrial Services has no objection to this request and the government, by AUSA Timothy Capozzi, defers to the position of Pretrial Services. Of course, should Your Honor approve this request, Mr. Thapa will provide Pretrial Services with a detailed itinerary of his trip.

By way of background, Your Honor released Mr. Thapa in December 2022 on a \$250,000 personal recognizance bond with conditions restricting, *inter alia*, the defendant's travel to the Southern and Eastern Districts of New York, as well as the Southern and Central Districts of California. Mr. Thapa has remained on bail without issue since that time.

JEFFREY LICHTMAN

Hon. John P. Cronan United States District Judge September 11, 2023 Page 2

Thank you for the Court's consideration of this request; I remain available for a conference should Your Honor deem it necessary.

Respectfully submitted,

Jeffrey Einhorn

cc: Timothy Capozzi, Esq.

Assistant United States Attorney (by ECF)

Craig Stanziano

United States Pretrial Services (by email)

The request is granted.
Defendant may travel to Illinois to attend the wedding, provided that he provide Pretrial Services of a detailed itinerary in advance of his trip.

SO ORDERED. September 12, 2023 New York, New York

JOHN P. CRONAN

United States District Judge